

NICHOLAS A. TRUTANICH  
United States Attorney  
Nevada Bar No. 13644  
CHRISTOPHER BURTON  
Nevada Bar No. 12940  
BIANCA R. PUCCI  
Assistant United States Attorneys  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
PHONE: (702) 388-6336  
FAX: (702) 388-5087  
[Christopher.Burton4@usdoj.gov](mailto:Christopher.Burton4@usdoj.gov)  
[Bianca.Pucci@usdoj.gov](mailto:Bianca.Pucci@usdoj.gov)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JIMMY WASHINGTON JR.,

Defendant.

Case No. 2:18-cr-00384-APG-EJY

STIPULATION TO CONTINUE THE  
DEADLINE FOR RESPONSE AND  
REPLY TO DEFENDANT JIMMY  
WASHINGTON JR.'S MOTION TO  
SEVER

IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A. TRUTANICH, United States Attorney, and CHRISTOPHER BURTON and BIANCA R. PUCCI, Assistant United States Attorneys, counsel for the United States of America, and Assistant Federal Public Defenders KATHRYN NEWMAN and RAQUEL LAZO, counsel for defendant JIMMY WASHINGTON JR., that the Response to the Motion to Sever deadline currently set for August 27, 2020, be continued and reset to September 24, 2020; and that the Reply to the Motion to Suppress Evidence deadline be set to October 1, 2020. The parties will also be filing a stipulation to continue the trial that will accommodate these new deadlines.

This stipulation is entered into for the following reasons:

1. In determining its response to the defendant's motion to sever, the government

1 believes it is necessary to file a motion in limine concerning the admissibility of certain evidence  
2 before taking a position on the motion to sever.

3 2. Once the motion in limine is briefed and decided, the government will be able to  
4 take a position on the motion to sever.

5 3. The government contacted defense counsel and they agreed to the continuance.

6 4. The defendant is currently detained pending trial but does not object to a  
7 continuance.

8 5. The additional time requested herein is not sought for purposes of delay, but to  
9 allow the government the opportunity to resolve necessary issues in order to take an informed  
10 position on the motion to sever.

11 6. This is the first stipulation to continue the response and reply deadlines filed herein.

12  
13 DATED this 27th day of August, 2020.

14  
15  
16 //s//  
KATHRYN NEWMAN  
17 RAQUEL LAZO  
Counsel for Defendant  
18 JIMMY WASHINGTON JR.

Respectfully submitted,  
NICHOLAS A. TRUTANICH  
United States Attorney  
//s//  
CHRISTOPHER BURTON  
BIANCA R. PUCCI  
Assistant United States Attorneys

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JIMMY WASHINGTON JR.,

Defendant.

2:18-cr-00384-APG-EJY

**ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. In determining its response to the defendant's motion to sever, the government believes it is necessary to file a motion in limine concerning the admissibility of certain evidence before taking a position on the motion to sever.
2. Once the motion in limine is briefed and decided, the government will be able to take a position on the motion to sever.
3. The government contacted defense counsel and they agreed to the continuance.
4. The defendant is currently detained pending trial but does not object to a continuance.
5. The additional time requested herein is not sought for purposes of delay, but to allow the government the opportunity to resolve necessary issues in order to take an informed position on the motion to sever.
6. This is the first stipulation to continue the response and reply deadlines filed herein.

1           THEREFORE, good cause appearing, it is ORDERED that that the Response to the  
2 Motion to Sever is vacated and reset to September 24, 2020; and that the Reply to the Motion to  
3 Suppress Evidence deadline is set to October 1, 2020.

4  
5  
6 DATED 27th day of August, 2020.

7   
8 UNITED STATES MAGISTRATE JUDGE